

Notice of Motion

Debtors have filed a Motion to Modify their Confirmed Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If you do not want the court to grant the relief sought in the motion, then on or before **twenty-one (21) days** from the date set forth in the certificate of service for the motion, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to

Clerk of Courts, U.S. Bankruptcy Court, 1715 Spielbush Avenue, Toledo, OH 43604

OR your attorney must file a response using the court's ECF System.

The court must receive your response on or before the above date.

You must also send a copy of your response either by 1) the court's ECF System or by 2) regular U.S. Mail to:

DannLaw, PO Box 6031040, Cleveland, OH 44103;

Elizabeth Vaughan, Chapter 13 Trustee, 316 North Michigan Street, #501, Toledo, OH 43604

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief without further hearing or notice.

/s/ Brian D. Flick, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

US Trustee's Office, James M. Ashley and Thomas W. L. Ashley US Courthouse, Via email
Trustee@Usdoj.Gov

Elizabeth Vaughn, Chapter 13 Trustee, at officeofstanding@att.net, toledo13@ecf.epiqsystems.com

Steven H. Patterson, Esq., on behalf of Creditor Ditech Financial, LLC, at ohbk@rslegal.com

New Penn Financial, LLC, dba Shellpoint Mortgage Servicing, via ECF notice

Michael David Stultz on behalf of Creditor Ohio Department of Taxation, at
gtr@meyerkerschner.com

PRA Receivables Management, LLC, via ECF notice

Recovery Management Systems Corporation, via ECF notice

And via regular US Mail to all Creditors in the attached mailing matrix.

/s/ Brian D. Flick, Esq.
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William C. Behrens (0093031)
Attorneys for Debtors
DannLaw